

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD GREEN, ESQUIRE,	:	CIVIL ACTION NO.: 02-cv-4590
	:	
<i>Plaintiff,</i>	:	
	:	
vs.	:	
	:	
ZURICH AMERICAN INSURANCE	:	
COMPANY,	:	
	:	
<i>Defendant.</i>	:	

**JOINT MOTION FOR EXTENSION OF
DISCOVERY AND DISPOSITIVE MOTION
DEADLINES AND OTHER DATES IN SCHEDULING ORDER**

Plaintiff, by and through his attorneys, Lovitz & Gold, P.C., and Defendant, by and through its attorneys, Littler Mendelson, P.C., hereby requests an extension of the Court's discovery and dispositive motion deadlines and the other dates in the Court's scheduling order, including placing the case in the trial pool. As grounds for this motion, the parties states:

1. The Court recently entered a Discovery Schedule with the following deadlines:
 - (a) Discovery shall be completed by January 22, 2003;
 - (b) Expert reports shall be exchanged by January 22, 2003;
 - (c) Exhibits shall be premarked and exchanged by January 22, 2003;
 - (d) Reports and/or responses to expert witnesses shall be exchanged by January 22, 2003;
 - (e) Plaintiff's Pre-Trial Memorandum shall be completed by February 24, 2003;

- (f) Defendant's Pre-Trial Memorandum shall be completed by March 3, 2003;
- (g) Case will be placed in the Trial Pool on March 4, 2003.

2. Counsel for the Plaintiff plans on issuing a Request for Production of Documents and additionally plans on scheduling numerous depositions, including the depositions of Plaintiff, Elizabeth Walker, Esquire, Gerard Lipski, Esquire, Terance Kennedy, Esquire, and several other witnesses identified by the Plaintiff.

3. Defendant's counsel has issued Interrogatories and a Request for Production of Documents, which the Plaintiff is in the process of completing.

4. Due to holiday schedules and various other scheduling conflicts, neither Plaintiff's nor Defendant's counsel has been able to take the necessary depositions. It is for this reason that discovery cannot be completed as per the Court imposed deadlines. The parties request an additional sixty (60) days to complete discovery. The parties also request that the other dates identified in this Court's prior scheduling order be modified accordingly.

5. The parties request that the following dates be adopted by the Court:

- (a) Discovery shall be completed by March 22, 2003;
- (b) Expert reports shall be exchanged by March 22, 2003;
- (c) Exhibits shall be premarked and exchanged by March 22, 2003;
- (d) Reports and/or responses to expert witnesses shall be exchanged by March 22, 2003;
- (e) Plaintiff's Pre-Trial Memorandum shall be completed by April 24, 2003;
- (f) Defendant's Pre-Trial Memorandum shall be completed by May 3, 2003;
- (g) Case will be placed in the Trial Pool on May 4, 2003.

WHEREFORE, the parties request that the Court sign the proposed order modifying the discovery dates in the within Order.

LOVITZ & GOLD, P.C.

LITTLER MENDELSON, P.C.

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